



Hoosier Motor Club

June 3, 1998

3750 Guion Road
P.O. Box 88505
Indianapolis, IN 46208-0505

The Honorable Gloria Tristani
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED
AAA

JUN 15 1998

OFFICE OF
THE PRESIDENT

Dear Commissioner Tristani:

I am writing to reinforce AAA's concern over the Federal Communications Commission's Second Report and Order of February 20, 1997, which placed the Automobile Emergency Radio Service (AERS) frequencies in the newly created Industrial/Business (I/B) pool.

As AAA's FCC filings demonstrate, placement of the auto emergency frequencies in the I/B pool, without any coordination protection, is and will continue to be extremely detrimental to AAA's provision of emergency road service. AAA has proposed a very simple solution that will help ensure roadside emergencies continue to be attended to without having any adverse effect on private radio spectrum allocation and use.

In its petition for reconsideration, AAA has proposed that the auto emergency frequencies be given the same quasi-public safety treatment as railroads, petroleum, and utilities, whereby other coordinators would be required to request the use of a frequency before assigning it to a non-auto emergency use. The auto emergency frequency coordinator could then ensure the assignment would not cause interference with existing emergency uses.

The AAA Hoosier Motor Club, based in Indianapolis, responded to well over 100,000 requests for Emergency Road Service in 1997 alone. Of those, 41,000 requests were from consumers stranded away from their home or business, often in a dangerous situation. The AAA Hoosier Motor Club has a membership base of 340,000 members and is responsible for two-thirds of the geographical territory of the State of Indiana.

AAA nationally responds to more than 29 million calls per year. Thirty percent (8 million) of those calls are true emergencies presenting danger to life or property: a breakdown on the freeway, being locked out or stranded in a dangerous part of town or in a deserted area, clearing accidents from congested highways and streets. Clear channels are required to dispatch these emergency calls. If the auto emergency frequencies are subject to sudden and unanticipated interference from a new assignment, AAA can't respond to

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roadway emergencies quickly and efficiently. The number of auto emergency frequencies that encounter interference from other users will increase substantially as frequency coordinators become more familiar with the new I/B system and begin to make an increasing number of random assignments.

Granting the automobile emergency frequencies the same "quasi-public safety" status as railroads, petroleum, and utilities will not deprive any entity of the use of additional spectrum. It simply will recognize that automobile emergencies are a safety concern so that the frequencies used to dispatch emergency roadside service will not be assigned if they will cause interference to the incumbent user.

In closing, there are five specific reasons AAA's petition should be granted: (1) time is critical to emergency road service functions; (2) increasing interference and coordination problems have occurred under the current system; (3) emergency road service meets all the "quasi-public safety" characteristics cited by the FCC for railroads, power, and petroleum companies; (4) there will be a minimal impact on other radio frequency assignments; and (5) AAA emergency road service has already been recognized as a vital public safety service by Congress and many public safety entities.

AAA appreciates your consideration of these views and respectfully requests that the FCC grant AAA's petition for reconsideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Barnett", written over a horizontal line.

Larry Barnett

Vice President, AAA Hoosier Motor Club

Enclosures



Hudson Valley

Main Service Center
618 Delaware Avenue
Albany, NY 12209-1096
Telephone: (518) 426-1000
Fax: (518) 426-5204

Hudson Service Center
179 Healy Boulevard
Hudson, NY 12534
Telephone: (518) 828-4537
Fax: (518) 828-9927

Troy Service Center
514 Congress Street
Troy, NY 12180-4306
Telephone: (518) 272-3650
Fax: (518) 272-7548

<http://www.global2000.net/aaahv>

May 27, 1998

The Honorable
Commissioner
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Washington, D.C. 20554

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In its petition for reconsideration, AAA has proposed that the auto emergency frequencies be given the same quasi-public safety treatment as railroads, petroleum, and utilities, whereby other coordinators would be required to request the use of a frequency before assigning it to a non-auto emergency use. The auto emergency frequency coordinator could then ensure the assignment would not cause interference with existing emergency uses.

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Locally, AAA Hudson Valley responded to 87,781 calls for emergency road service in 1997. We serve a membership base of 92,925 members who reside in Albany, Rensselaer, Greene and Columbia Counties who depend on us to provide this service. In addition, our service providers report "live emergencies" as seen when they are out in the field. This information is then relayed to the proper authorities.

Granting the automobile emergency frequencies the same "quasi-public safety" status as railroads, petroleum, and utilities will not deprive any entity of the use of additional spectrum. It simply will recognize that automobile emergencies are a safety concern so that the frequencies used to dispatch emergency roadside service will not be assigned if they will cause interference to the incumbent user.

Earlier this week AAA released new information, which we believe makes a compelling case for the relief we seek. In particular, we have cited five specific reasons AAA's petition should be granted: (1) time is critical to emergency road service functions; (2) increasing interference and coordination problems have occurred under the current system; (3) emergency road service meets all the "quasi-public safety" characteristics cited by the FCC for railroads, power, and petroleum companies; (4) there will be minimal impact on other radio frequency assignments; and (5) AAA emergency road service has already been recognized as a vital public safety service by Congress and many public safety entities.

AAA appreciates your consideration of these views and respectfully requests that the FCC grant AAA's petition for reconsideration.

Sincerely,.

George I. Zeller
Manager, Member Services

GIZ:tl



May 27, 1998

The Honorable William E. Kennard
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

111 West Fifth Street
P.O. Box 279
Jamestown, NY 14702-0279
716/488-1981
FAX 716/483-2779

Dear Chairman Kennard:

I am writing to ask for your assistance in granting AAA auto emergency frequencies the same quasi-public safety treatment as railroad, petroleum and utilities.

AAA is currently in the Industrial/Business pool for frequency coordination and as a result we are experiencing interference problems and we expect these problems to worsen.

Nationally AAA responds to over 29 million calls a year and about 30% are true emergencies! I would hate to think of a loved one being denied service in a dangerous situation because of radio service interference. The solution is simple, grant our frequencies "quasi-public safety status". Granting us this status will not deprive any entity of the use of additional spectrum.

You may be aware that:

1. Time is critical in emergency road service.
2. Interference and coordination problems have increased under the current system.
3. Emergency Road Service meets all "quasi-public safety" characteristics.
4. There will be little impact on other radio frequency assignment.
5. AAA-ERS has been recognized by Congress and many public safety entities as a vital public service.

AAA Jamestown requests that the FCC grant AAA's petition for reconsideration.

Sincerely yours,

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Barry L. Benson
President & Treasurer

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THE PRESIDENT



111 West Fifth Street
P.O. Box 279
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May 27, 1998

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Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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President & Treasurer



COPY

May 29, 1998

155 Parker Street
Lawrence, MA 01842-0039
Tel 978/681-9200
Fax 978/688-4891

The Honorable William E. Kennard
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Dear Chairman Kennard:

Please be aware of AAA Merrimack Valley's deep concern over the Federal Communications Commission's Second Report and Order of February 20, 1997, which placed the Automobile Emergency Radio Service (AERS) frequencies in the newly created Industrial/Business (I/B) pool.

As AAA's FCC filings demonstrate, placement of the auto emergency frequencies in the (I/B) pool, without any coordination protection, is and will continue to be extremely detrimental to our provision of providing emergency road service.

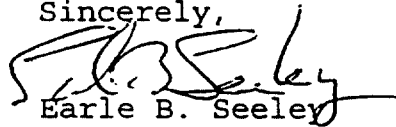
At the present time, AAA Merrimack Valley serves approximately 163,000 local AAA members and many thousands of visiting members who pass through our territory in route to vacation destinations.

Last year, we provided 120,670 AAA members with emergency road service calls. Of that number approximately 11,620 calls were true emergency calls that responded to accidents, breakdowns on the Interstate systems, and calls reported to us by local and state police. Please be advised that we also have an affiliation with local hospitals providing emergency road service for their doctors and nurses during emergency storm conditions where traffic has come to a halt.

Needless to say, it is important that AAA be able to respond to highway emergencies quickly and efficiently.

I appreciate your consideration of these views and respectfully request that the FCC grant AAA's petition for reconsideration.

Sincerely,


Earle B. Seeley
President/CEO

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OFFICE OF
THE PRESIDENT

cc: Commissioners Furchtgott-Roth, Ness, Powell & Tristani



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Earle B. Seeley
President/CEO

cc: Commissioners Furchtgott-Roth, Ness & Powell and
Chairman Kennard



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President/CEO

cc: Commissioners Ness, Powell & Tristani & Chairman Kennard



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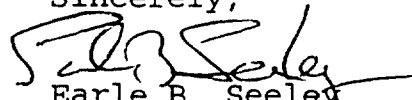
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Earle B. Seeley
President/CEO

cc: Commissioners Furchtgott-Roth, Powell & Tristani and
Chairman Kennard



New Jersey
Automobile Club

June 2, 1998

1 Hanover Road
Florham Park, NJ 07932-1888
(973) 377-7200

The Honorable William E. Kennard
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Dear Chairman Kennard:

I'm writing in support of a letter you recently received from AAA President, Bob Darbelnet, concerning the placement of Automobile Emergency Radio service (AERS) frequencies in the newly created Industrial/Business (I/B) pool.

Each year, our Club responds to more than 225,000 calls for emergency roadside assistance. Thirty percent of these calls involve a true emergency where the motorist's life and/or property is in danger. Having clear channels to dispatch emergency assistance to these motorists is critical, particularly when you consider that we serve an extremely congested three-county area of Northern New Jersey.

I urge you and your fellow commissioners to grant AAA's petition that auto emergency frequencies be given the same quasi-public safety treatment as railroads, petroleum and utilities. This proposal will help ensure roadside emergencies continue to be attended to without having any adverse effect on private radio spectrum allocation and use.

Let me reiterate what Mr. Darbelnet cited in his letter as the five reasons AAA's petition should be granted: time is critical to emergency road service functions; increasing interference and coordination problems have occurred under the current system; emergency road service meets all the "quasi-public safety" characteristics cited by the FCC for railroads, and power, and petroleum companies; there will be minimal impact on other radio frequency assignments; and AAA emergency road service has already been recognized as a vital public safety service by Congress and many public safety entities including the police community in the area we serve.

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Frederick L. Gruel
President & CEO

FLG/psf

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FLG/psf



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I urge you and your fellow commissioners to grant AAA's petition that auto emergency frequencies be given the same quasi-public safety treatment as railroads, petroleum and utilities. This proposal will help ensure roadside emergencies continue to be attended to without having any adverse effect on private radio spectrum allocation and use.

Let me reiterate what Mr. Darbelnet cited in his letter as the five reasons AAA's petition should be granted: time is critical to emergency road service functions; increasing interference and coordination problems have occurred under the current system; emergency road service meets all the "quasi-public safety" characteristics cited by the FCC for railroads, and power, and petroleum companies; there will be minimal impact on other radio frequency assignments; and AAA emergency road service has already been recognized as a vital public safety service by Congress and many public safety entities including the police community in the area we serve.

On behalf of our 335,000 members, I thank you for your consideration of this matter and urge the FCC to grant AAA's petition for reconsideration.

Sincerely,


Frederick L. Gruel
President & CEO

FLG/psf



HEADQUARTERS

418 Hamburg Turnpike
Wayne, N.J. 07474-0983
973-956-2200

May 27, 1998

RECEIVED
AAA

JUN 02 1998

OFFICE OF
THE PRESIDENT

Hon. William E. Kennard, Chairman
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Dear Chairman Kennard:

I am writing to reinforce AAA's concern over the Federal Communications Commission's Second Report and Order of February 20, 1997 which placed the Automobile Emergency Radio Service (AERS) frequencies in the newly created Industrial/Business (I/B) pool.

As AAA's FCC filings demonstrate, placement of the auto emergency frequencies in the I/B pool, without any coordination protection, is and will continue to be extremely detrimental to AAA's provision of emergency road service. AAA has proposed a very simple solution that will help ensure roadside emergencies continue to be attended to without having any adverse effect on private radio spectrum allocation and use.

In its petition for reconsideration, AAA has proposed that the auto emergency frequencies be given the same quasi-public safety treatment as railroads, petroleum, and utilities, whereby other coordinators would be required to request the use of a frequency before assigning it to a non-auto emergency use. The auto emergency frequency coordinator could then ensure the assignment would not cause interference with existing emergency uses.

AAA responds to more than 29 million calls per year. Thirty percent (8 million) of those calls are true emergencies presenting danger to life or property: a breakdown on the freeway, being locked out or stranded in a dangerous part of town or in a deserted area, clearing accidents from congested highways and streets. Locally in our North Jersey area, the problem is even more urgent given the overcrowding of highways in this commuter rich area. Clear channels are required to dispatch these emergency calls. If the auto emergency frequencies are subject to sudden and unanticipated interference from a new assignment, AAA can't respond to roadway emergencies quickly and efficiently. The number of auto emergency frequencies that encounter interference from other users will increase substantially as frequency coordinators become more familiar with the new I/B system and begin to make an increasing number of random assignments.

Granting the automobile emergency frequencies the same "quasi-public safety" status as railroads, petroleum, and utilities will not deprive any entity of the use of additional spectrum. It simply will recognize that automobile emergencies are a safety concern so that the frequencies used to

dispatch emergency roadside service will not be assigned if they will cause interference to the incumbent user.

AAA has cited five specific reasons AAA's petition should be granted: (1) time is critical to emergency road service functions; (2) increasing interference and coordination problems have occurred under the current system; (3) emergency road service meets all the "quasi-public safety" characteristics cited by the ICC for railroads, power, and petroleum companies; (4) there will be a minimal impact on other radio frequency assignments; and (5) AAA emergency road service has already been recognized as a vital public safety service by Congress and many public safety entities.

AAA appreciates your consideration of these views and respectfully requests that the FCC grant AAA's petition for reconsideration.

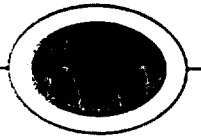
Very truly yours,

David L. Hughes
Executive Vice President

cc: Robert L. Darbelnet, President and CEO, AAA

Automobile Club of New York, Inc.

Headquarters: 1415 Kellum Place, Garden City, New York 11530-1690 (516) 746-7730



June 5, 1998

Honorable Gloria Tristani
Commissioner
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

Dear Commissioner Tristani:

I am writing to express our concern over the Federal Communications Commission's Second Report and Order of February 20, 1997, which placed the Automobile Emergency Radio Service (AERS) frequencies in the newly created Industrial/Business (I/B) pool. The Automobile Club of New York (the "Club") is AAA's local affiliate for the area in and around New York City, serving over 1.1 million members.

The placement of the Auto Emergency Road Service frequencies in the I/B pool without any coordination protection, is and will continue to be extremely detrimental to the Club's ability to respond to automobile emergencies.

In its petition for reconsideration, AAA has proposed a simple solution to ensure roadside emergencies are responded to, while preserving private parties rights to radio spectrum allocation and use. Under the proposal, AERS users would be given the same quasi-public safety treatment as railroads, petroleum companies, and utilities whereby other coordinators would be required to request the use of a frequency before assigning it to a non-auto emergency use. The auto emergency frequency coordinator could then ensure the assignment would not cause interference with existing emergency uses.

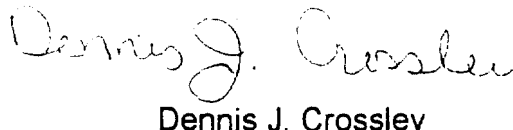
One of our most important member services is emergency road service – answering calls for emergency assistance from members whose cars have broken down or who have been involved in an accident. In 1997, the Club responded to over 650,000 calls for emergency road service. A substantial number of those calls are real life emergencies; calls from members with medical conditions, calls from members in which babies or children are locked in cars, and calls from members stranded along a busy roadway. Clear channels are required to dispatch these emergency calls. If the auto emergency frequencies are subject to sudden and unanticipated interference from a new assignment, the Club can't respond to roadway emergencies quickly and efficiently. The number of auto emergency frequencies that encounter interference from other

users will increase substantially as frequency coordinators become more familiar with the new I/B system and begin to make an increasing number of random assignments.

Granting the automobile emergency frequencies the same "quasi-public safety" status as railroads, petroleum companies, and utilities will not deprive any entity of the use of additional spectrum. It simply will ensure that automobile emergency road service provided frequencies will not be assigned if they will cause interference to the incumbent user.

The Club appreciates your consideration of these views and respectfully requests that the FCC grant AAA's petition for reconsideration.

Very truly yours,

A handwritten signature in cursive script that reads "Dennis J. Crossley".

Dennis J. Crossley
Vice President
Public & Government Services

DJC:wlt



Ohio Motorists Association

5700 Brecksville Road
Independence, Ohio 44131-1514
(216) 606-6100

Office of the President

**RECEIVED
AAA**

June 8, 1998

JUN 18 1998

**OFFICE OF
THE PRESIDENT**

The Honorable William E. Kennard
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Kennard:

I have just been advised by our national office that a recent decision by your agency would place AAA emergency frequencies in a business-industrial pool for the purpose of frequency consolidation. This decision will have a detrimental impact on our ability to provide this important emergency service to our members and the motoring public.

The Ohio Motorists Association, representing 650,000 AAA members in Northeast Ohio, joins with the national AAA organization in its petition for reconsideration of this decision. We feel strongly and unequivocally that this FCC staff decision should be reversed.

Clearly, AAA in responding to 29 million calls for emergency service each year, should be given "quasi-public safety" status. I understand that this designation already has been given to railroads, utilities and the petroleum industry. AAA Emergency Road Service communications are equally important to the well-being of those on our public highways.

AAA responds to about 8 million calls nationally each year that are true emergencies involving danger to life and property. Certainly there are many more situations in which motorists and their families are in serious jeopardy due to automobile breakdowns or related problems.

These emergency service calls include breakdowns on the freeway, being locked out or stranded in a dangerous part of town or in a deserted area, and clearing accidents from congested highways and streets. Clear channels are required to dispatch these emergency calls. If the auto emergency frequencies are subject to sudden and unanticipated interference from a new assignment, AAA will no longer be able to respond to roadway emergencies quickly and efficiently. The number of auto emergency frequencies that encounter interference from other users will increase substantially as frequency coordinators become more familiar with the new I/B system and begin to make an increasing number of random assignments.

The Honorable William E. Kennard

Page 2

June 8 , 1998

In its petition for reconsideration, AAA has proposed that the auto emergency frequencies be given the same quasi-public safety treatment as railroads, petroleum, and utilities, whereby other coordinators would be required to request the use of a frequency before assigning it to a non-auto emergency use. The auto emergency frequency coordinator could then ensure the assignment would not cause interference with existing emergency uses.

There is little doubt that Congress specifically recognized AAA's public safety role in exempting our emergency frequencies from auction in the passage of the Telecommunications Act. We urge the commission to recognize our role in providing critical emergency services to the motoring public and designate AAA in the quasi-public service category.

Thank you for your interest in this important issue and your consideration of our request. I would be pleased to discuss this further and answer any questions that you may have regarding our vital Emergency Road Service operation. You may contact me directly at 216/606-6230.

Sincerely,

AAA Ohio Motorists Association

A handwritten signature in black ink, appearing to read "Peter C. Ohlheiser". The signature is fluid and cursive, with a large initial "P" and "O".

Peter C. Ohlheiser
President

bc: Robert L. Darbelnet
James L. Kolstad
Marshall L. Doney